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8 *claim Plaintiff Micron Technology, Inc., and Defendant*
Micron Consumer Products Group LLC

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA

11 SAN FRANCISCO DIVISION

12 YANGTZE MEMORY TECHNOLOGIES
13 COMPANY, LTD.,

14 Plaintiff,

15 v.

16 MICRON TECHNOLOGY, INC., et al.,

17 Defendants.

18
19 MICRON TECHNOLOGY, INC.,

20 Counterclaim Plaintiff,

21 v.

22 YANGTZE MEMORY TECHNOLOGIES
23 COMPANY, LTD., and YANGTZE
MEMORY TECHNOLOGIES, INC.,

24 Counterclaim Defendants.
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27
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Case No. 3:23-cv-05792-RFL

**STIPULATION TO EXTEND CERTAIN
DEADLINES PURSUANT TO PATENT
L.R. 4-2 AND THE SCHEDULING
ORDER (ECF NO. 141) PURSUANT TO
CIVIL LOCAL RULE 6-1(B)**

1 Pursuant to Civil Local Rule 6-1(b), the parties agree to extend certain deadlines pursuant
2 to Patent L.R. 4-2 and this Court's Scheduling Order (ECF No. 141) as follows:

3 1. The Parties' Patent L.R. 4-2 Exchange of Preliminary Claim Constructions and
4 Extrinsic Evidence is presently due on January 6, 2025, Monday after the Christmas and New
5 Year's federal holidays. In light of Micron's downtime from December 23, 2024 to January 3,
6 2025 during the federal holidays, and to account for appropriate client consultation, Defendant and
7 Counterclaim Plaintiff Micron Technology, Inc. and Defendant Micron Consumer Products Group,
8 LLC (collectively, "Micron") reached out to request an extension of the parties' Patent L.R. 4-2
9 service deadlines to January 8, 2025. Plaintiff and Counterclaim Defendant Yangtze Memory
10 Technologies Company, Ltd. ("YMTC")'s Phase 1 Narrowing of Infringement Claims to 70 Claims
11 is due on January 14, 2025. Dkt. 141. While YMTC is working to narrow its infringement claims
12 to 70 claims, it reached out to Micron to request an additional ten days to narrow its claims. The
13 parties met and conferred and agreed to stipulate as follows:

14 a. The parties' Patent L.R. 4-2 Exchange of Preliminary Claim Constructions
15 and Extrinsic Evidence will be extended from January 6, 2025 to January 8, 2025;

16 b. YMTC's deadline for Phase 1 Narrowing of Infringement Claims to 70
17 Claims will be extended from January 14, 2025 to January 24, 2025;

18 c. Micron's deadline for Phase 1 Narrowing of Invalidity Grounds to 8
19 grounds/claim will be extended from January 21, 2025 to January 31, 2025.

20 2. On November 29, 2023, YMTC and Micron stipulated to extend Micron's deadline
21 to answer or otherwise respond to the complaint from December 5, 2023, to and including January
22 19, 2024 (ECF No. 18). On February 28, 2024, the parties filed a stipulation to allow YMTC four
23 additional days to respond to Micron's counterclaims (ECF No. 46), which was granted on February
24 29, 2024 (ECF No. 47). On March 26, 2024, the parties filed a stipulation to extend the hearing on
25 YMTC's motion to dismiss Micron's counterclaims (ECF No. 51), which was granted on March
26 27, 2024 (ECF No. 52). On June 14, 2024, the parties filed a stipulation to extend the service
27 deadline for the parties' Invalidity Contentions from June 20, 2024 to June 27, 2024 (ECF No. 72).
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On July 24, 2024, the parties filed a stipulation to extend the service deadline for Patent L.R. 4-2 Exchange of Preliminary Claim Constructions and Extrinsic Evidence from July 25, 2024 to August 1, 2024 (ECF No. 84), which was granted on July 25, 2024 (ECF No. 85). On July 31, 2024, the parties filed a stipulation to extend the service deadline for Patent L.R. 4-2 Exchange of Preliminary Claim Constructions and Extrinsic Evidence from August 1, 2024 to August 5, 2024 (ECF No. 90). On September 19, 2024, the parties filed a stipulation to extend the deadline for Micron to answer the Consolidated Complaint from September 17, 2024 to September 20, 2024 (ECF No. 135). On November 13, 2024, the parties filed a stipulation to extend certain deadlines pursuant to Patent L.R. 3-3, 3-4(b)-(e), and 4-1 (ECF No. 176). On November 19, the parties filed a stipulation to extend briefing deadlines regarding the Motion to Dismiss and Strike (ECF No. 178), which was granted on November 20, 2024 (ECF No. 179). There have been no other time modifications in this case.

3. The modification to the deadline pursuant to Patent L.R. 4-2 and the narrowing of infringement claims and invalidity grounds will have no effect on any other dates in the case schedule.

Dated: January 6, 2025

ORRICK, HERRINGTON & SUTCLIFFE LLP

By: /s/ J. Jason Lang
 J. Jason Lang
*Attorneys for Defendant and Counterclaim Plaintiff
 Micron Technology, Inc., and Defendant Micron
 Consumer Products Group LLC*

Dated: January 6, 2025

ROPES & GRAY LLP

By: /s/ Andrew Radsch
 Andrew Radsch
*Attorneys for Plaintiff and Counterclaim Defendant
 Yangtze Memory Technologies Company, Ltd., and
 Counterclaim Defendant Yangtze Memory
 Technologies, Inc.*

SIGNATURE ATTESTATION

I, J. Jason Lang, am the ECF User whose ID and password are being used to file this STIPULATION TO EXTEND CERTAIN DEADLINES PURSUANT TO PATENT L.R. 4-2 AND THE SCHEDULING ORDER (ECF NO. 141) PURSUANT TO CIVIL LOCAL RULE 6-1(B). In compliance to General Order 45, X.B and Civil Local Rule 5-1(i), I hereby attest that I have obtained approval for the filing of this document from all the signatories for whom a signature is indicated by a “conformed” signature (/s/) within this e-filed document.

Dated: January 6, 2025

ORRICK, HERRINGTON & SUTCLIFFE LLP

By: /s/ J. Jason Lang
J. Jason Lang
*Attorneys for Defendant and Counterclaim Plaintiff
Micron Technology, Inc., and Defendant Micron
Consumer Products Group LLC*